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Date October 6, 2004			EPA Reg. No./File Symbol 67	7702-	Page 1 of 2				
Applicant's/Registrant's Name & Address W. Neudorff GmbH KG 1008 Riva Ridge Drive Great Falls, VA 22066-1620			Product Neudorff's Insecticidal Soap						
Ingredient Potassium salts of fatty acids									
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note				
830.1550	Product identity and composition		67702	OWN					
830.1600	Description of mtls. used to produce prod.		67702	OWN					
830.1620	Description of production process		67702	OWN					
830.1670	Discussion of formation of impurities		67702	OWN					
830.1700	Preliminary analysis	44980302	67702	OWN					
830.1750	Certified limits	44980302	67702	OWN					
830.1800	Enforcement analytical method	44980302	67702	OWN					
830.6302	Color	44980303	67702	OWN					
830.6303	Physical state	44980303	67702	OWN					
830.6304	Odor	44980303	67702	OWN					
830.6317	Storage stability	44980303	67702	OWN					
830.6320	• Corrosion characteristics	44980303	67702	OWN					
	рН	44980303	67702	OWN					
830.7100	• Viscosity	44980303	67702	OWN					
830.7300	Density	44980303	67702	OWN					

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Date October 6, 2004  Applicant's/Registrant's Name & Address W. Neudorff GmbH KG 1008 Riva Ridge Drive Great Falls, VA 22066-1620		EPA Reg. No./File Symbol 67702	2-	Page 2 of 2	
			Product Neudorff's Insecticidal Soap		
Ingredient Potassium salts of fat	ty acids				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute oral toxicity	44980304	67702	OWN	A L
870.1200	Acute dermal toxicity	44980305	67702	OWN	a harm
870.1300	Acute inhalation toxicity study	44980306	67702	OWN	
870.2400	Primary eye irritation	44980307	67702	OWN	
870.2500	Primary dermal irritation	44980308	67702	OWN	
870.2600	Skin sensitization	44980309	67702	OWN	
			12 12		
				*	
			2 3		
	• •••				
•					
•					
Signature	Holisk		Name and Title Walter G. Talan Authorized Ag		Date 10/6/04

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	DATA MA	TRIX (Generic)			
Date October 6, 2004  Applicant's/Registrant's Name & Address W. Neudorff GmbH KG 1008 Riva Ridge Drive Great Falls, VA 22066-1620		1	EPA Reg. No./File Symbol 67702- Product Neudorff's Insecticidal Soap		Page 1 of 2
Ingredient Potassium salts of fat	ty acids		T-PILMENT OF	200-45-	_
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	Product properties test guidelines	- 1			Waiver
OPPTS Series 835	Fate, transport and transformation test guidelines				Waiver
OPPTS Series 860	Residue chemistry test guideline	L. VI	1-2	4.	Waiver
OPPTS Series 870	Health effects test guidelines				Waiver
OPPTS Series 875	Occupational and residential exposure test guidelines				Waiver
850.1010	Aquatic invertebrate acute toxicity	44980315	67702	OWN	
		40066200	36488	OLD	
7 11 1		00030865	42697	OLD	
		00096638	42697	OLD	
850.1075	Fish acute toxicity – bluegill sunfish	44980314	67702	OWN	
		00157473	42697	OLD	
		40066200	36488	OLD	
850.1075	Fish acute toxicity - rainbow trout	44980313	67702	OWN	
		00096636	42697	OLD	
Signature	Tabuk		Name and Title Walter G. Tala Authorized Ag		Date 10/6/04

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•	DATA MA	TRIX (Generic)			
Date October 6, 2004  Applicant's/Registrant's Name & Address W. Neudorff GmbH KG 1008 Riva Ridge Drive Great Falls, VA 22066-1620		TREE (Generic)	EPA Reg. No./File Symbol 67702- Product Neudorff's Insecticidal Soap		Page 2 of 2
Ingredient Potassium salts of fatt	y acids	T	<del></del>		<del> </del>
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		00096637	42697	OLD	
		40066200	36488	OLD	
850,2100	Avian acute oral toxicity – bobwhite quail	44980310	67702	OWN	
850,2200	Avian dietary toxicity – bobwhite quail	44980311	67702	OWN	
		00096640	42697	OLD	
		00010504	42697	OLD	
		40066203	36488	OLD	
850.2200	Avian dietary toxicity – mallard duck	44980312	67702	OWN	
		40066204	36488	OLD	
850.3020	Honey bee acute contact toxicity	45060901	67702	OWN	
• •	• •••				
****	• • •				
	• • • •				
Signature	1		Name and Title Walter G. Ta	alarek	Date 10/6/04
	T) Electronic and Paner versions available. Submit only Paner versions		Authorized		

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	DATA MATRIX (	Generic) (Agency	у Сору)		
Date: February 13, 2017  Applicant's/Registrant's Name & Address: W. Neudorff GmbH KG An der Muhle 3 31860 Emmerthal, Germany		EPA Reg. No./File Symbol: 67702-22		Page 1 of 7	
		Product: Neudorff's Insecticidal Soap Concentrate			
Ingredients – Potassium salts of fa	itty acids	<del> </del>			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and composition				Waived - Footnote 1
830.1600	Description of materials used to produce product				Waived - Footnote 1
830.1620	Description of production process				Waived - Footnote 1
830.1650	Description of formulation process				Waived - Footnote 1
830.1670	Discussion of formation of impurities				Waived - Footnote 1
830.1700	Preliminary analysis				Waived - Footnote 1
830.1750	Certified limits				Waived - Footnote 1
830.1800	Enforcement analytical method				Waived - Footnote 1
830.6302	Color				Waived - Footnote 1
830.6303	Physical state				Waived - Footnote 1
830.6304	Odor				Waived - Footnote 1
830.6313	Stability				Waived - Footnote 1
830.6314	Oxidation/reduction; chemical incomptibility			N.A.	
830.6315	Flammability			N.A.	
830.6316	Explodability			N.A.	
830.6317	Storage stability			N.A.	
830.6319	Miscibility			N.A.	
Signature	lock		Name and Title: Walter G. Ta Authorized A		Date: 2/13/2017

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	DATA MATRIX	(Generic) (Agency	(Copy)	<u> </u>		
Date: February 13, 2017		EPA Reg. No./File Symbol: 67	702-22	Page 2 of 7		
Applicant's/Registrant's Name &	Address: W. Neudorff GmbH KG An der Muhle 3 31860 Emmerthal, Germany		Product: Neudorff's Insecticidal Soap Concentrate			
Ingredients - Potassium salts of fa	atty acids		T		<del>.  </del>	
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.6320	Corrosion characteristics			N.A.		
830.6321	Dielectric breakdown voltage			N.R.		
830.7000	pН				Waived - Footnote 1	
830.7050	UV/visible light absorption	48283201	67702	OWN		
830.7100	Viscosity			N.A.		
830.7200	Melting point			N.A.		
830.7220	Boiling point				Waived - Footnote I	
830.7300	Density/relative density/bulk density				Waived - Footnote 1	
830.7370	Dissociation constants in water				Waived - Footnote 1	
830.7520	Particle size, fiber length, and diameter distribution				Waived - Footnote 1	
830.7550/7560/7570	Partition coefficient (n-octanol/water)				Waived - Footnote 1	
830.7840/7860	Water solubility				Waived - Footnote 1	
830.7950	Vapor pressure				Waived - Footnote 1	
835.2120	Hydrolysis	00164005	42697	OLD	Waived - Footnote I	
835.2240	Photodegradation in water				Waived - Footnote I	
Signature	Nolock		Name and Title: Walter G. Tale Authorized Ag		Date: 2/13/2017	

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Date: February 13, 2017			EPA Reg. No./File Symbol: 67702-22		Page 3 of 7			
Applicant's/Registrant's Name & Address: W. Neudorff GmbH KG An der Muhle 3 31860 Emmerthal, Germany			Product: Neudorff's Insecticidal Soap Concentrate					
Ingredients – Potassium salts of fatty acids								
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note			
835.2410	Photodegradation in soil				Waived - Footnote 1			
835.4100	Aerobic soil metabolism	00157476	42697	OLD	Waived - Footnote 1			
835.4200	Anaerobic soil metabolism				Waived - Footnote 1			
835.4300	Aerobic aquatic metabolism				Waived - Footnote 1			
835.4400	Anaerobic aquatic metabolism				Waived - Footnote 1			
835.1230/1240	Leaching and adsorption/desorption				Waived - Footnote 1			
835.6100	Terrestrial field dissipation				Waived - Footnote 1			
850.1010	Acute toxicity freshwater invertebrates	44980315	67702	OWN				
850.1075	Freshwater fish toxicity	44980313	67702	OWN				
		44980314	67702	OWN				
850.1025/1035/1045/ 1075	Acute toxicity estuarine and marine organisms	48469801	67702	OWN				
		48469802	67702	OWN				
850.1300	Aquatic invertebrate life-cycle (freshwater)	48668601	67702	OWN				
850.1400	Fish early life stage (freshwater)				Waived - Footnote 1			
850.2100	Avian acute oral toxicity	44980310	67702	OWN				
		00096639	42697	OLD				
		40066202	36488	OLD				
Signature	1 Dark		Name and Title: Walter G. T Authorized		Date 2/13/2017			

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	DATA MATRIX (	Generic) (Agenc	у Сору)		
Date: February 13, 2017  Applicant's/Registrant's Name & Address: W. Neudorff GmbH KG An der Muhle 3 31860 Emmerthal, Germany			EPA Reg. No./File Symbol: 6770	)2-22	Page 4 of 7
			Product: Neudorff's Insecticidal Soap Concentrate		
Ingredients – Potassium salts of fa	atty acids				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.2200	Avian dietary toxicity	44980311	67702	OWN	
		44980312	67702	OWN	
850.2300	Avian reproduction				Waived - Footnote 1
850.3020	Honey bee acute contact toxicity	45060901	67702	OWN	
850.4100	Seedling emergence	48402301	67702	OWN	
850.4150	Vegetative vigor	48402302	67702	OWN	
850.4400	Aquatic plant growth	48469803	67702	OWN	
850.5400	Aquatic plant growth	48402303	67702	OWN	
860.1100	Chemical identity				Waived - Footnote 1
860.1200	Directions for use				Waived - Footnote 1
860.1550	Proposed tolerance				Waived - Footnote 1
860.1600	Reasonable grounds in support of petition				Waived - Footnote 1
860.1650	Submittal of analytical reference standards				Waived - Footnote 1
860.1300	Nature of residue in plants				Waived - Footnote 1
860.1300	Nature of residue in livestock				Waived - Footnote 1
860.1850	Confined rotation crops			<u> </u>	Waived - Footnote 1
Signature	Molant		Name and Title: Walter G. Talar Authorized Age		Date: 2/13/2017

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	DATA MATR	IX (Generic) (Agenc	y Copy)			
Date: February 13, 2017		_	EPA Reg. No./File Symbol: 67702-22		Page 5 of 7	
Applicant's/Registrant's Name &	Name & Address: W. Neudorff GmbH KG An der Muhle 3 31860 Emmerthal, Germany  Product: Neudorff's Insecticidal Soap Concentrate					
Ingredients – Potassium salts of fa	atty acids					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
870.3700	Prenatal developmental				Waived - Footnote 1	
870.3800	Reproduction and fertility effects				Waived - Footnote 1	
870.4100	Chronic oral				Waived - Footnote 1	
870.4200	Carcinogenicity				Waived - Footnote 1	
870.5100	Bacterial reverse mutation assay				Waived - Footnote 1	
870.5300/5375	In vivo mammalian cell assay				Waived - Footnote 1	
870.5385/5395	In vivo cytogenetics				Waived - Footnote 1	
870.6200	Acute neurotoxicity				Waived - Footnote 1	
870.6200	90-day neurotoxicity – rat				Waived - Footnote 1	
870.7485	Metabolism and pharmacokinetics				Waived - Footnote 1	
870.7800	Immunotoxicity				Waived - Footnote 1	
875.1100	Derma; outdoor exposure				Waived - Footnote 1	
875.1200	Dermal indoor exposure				Waived - Footnote 1	
875.1300	Inhalation outdoor exposure				Waived - Footnote 1	
875.1400	Dermal indoor exposure				Waived - Footnote 1	
875.1500	Biological monitoring				Waived - Footnote 1	
875.1600	Data reporting and calculations				Waived - Footnote 1	
Signature	slarek		Name and Title: Walter G. Tal Authorized A		Date: 2/13/2017	

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Date: February 13, 2017  Applicant's/Registrant's Name & Address: W. Neudorff GmbH KG  An der Muhle 3  31860 Emmerthal, Germany		EPA Reg. No./File Symbol: 67702-22		Page 5 of 7	
			Product: Neudorff's Insecticidal Soap Concentrate		
Ingredients – Potassium salts of fa	atty acids				<del></del>
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.1700	Product use information				Waived - Footnote
875.2100	Dislodgeable foliar residue and turf transferrable residues				Waived - Footnote
875.2200	Soil residue dissipation			-	Waived - Footnote
875.2300	Indoor surface residue dissipation				Waived - Footnote
875.2400	Dermal exposure				Waived - Footnote
375.2500	Inhalation exposure				Waived - Footnote
875.2600	Biological monitoring				Waived - Footnote
875.2700	Product use information				Waived - Footnote
875.2800	Description of human activity				Waived - Footnote
875.2900	Data reporting and calculations				Waived - Footnote
875.3000	Nondietary ingestion exposure				Waived - Footnote
Signature	1 Do 1 W		Name and Title: Walter G. Ta Authorized A		Date: 2/13/2017

### Footnote 1 to February 13, 2017, Data Matrix (Generic) for Neudorff's Insecticidal Soap RTU MP (EPA File Symbol 67702-LN)

Since 1998 W. Neudorff GmbH KG ("Neudorff") has been requesting and the Agency has been granting waivers for these generic data requirements for products containing soap salts as active ingredients. Waivers of the data requirements were requested for the following registrations: (1) 67702-7; (2) 67702-8; (3) 67702-11; (4) 67702-12; (5) 67702-13; (6) 67702-18; (7) 67702-19; (8) 67702-21; (9) 67702-22; (10) 67702-23; (11) 67702-34; (12) 67702-44; (13) 67702-45; (14) 67702-46; and (15) 67702-50. As recently as October 6, 2015, the Agency did not require the submission or citation of data to fulfill most of the generic data requirements applicable to the registration of a Neudorff product containing potassium salts of fatty acids, i.e., Neudorff's Insecticidal Soap RTU MP, EPA Reg. No. 67702-50.

The waiver rationale consistently used by Neudorff is the technical grade of the active ingredient ("TGAI") does not exist independently of the enduse product ("EP"), and cannot be isolated; and the TGAI is formed during EP production process.

Further, in the past, Neudorff has relied on the Reregistration Eligibility Document ("RED") Soap Salts (September 1992); EPA 738-F-92-013, for waivers that the Agency has granted for all 40 CFR Part 158 residue chemistry, occupational and residential exposure, toxicology, environmental fate and some 40 CFR Part 158 ecological effects requirements. See Appendix B of the RED.

Next, please note that the Agency has promulgated a tolerance exemption for residues of potassium salts of fatty acids in or on all raw agricultural commodities. See 40 CFR § 180.1068.

Last, the Agency's "Soap Salts Final Work Plan (FWP) for Registration Review February 2009" and "Soap Salts Summary Document Registration Review: Initial Docket September 2008" specifically continue the waivers for all generic mammalian toxicity data requirements and state that no additional data are required for residential and occupational exposure, product or residue chemistry and toxicity. Moreover, please note that Neudorff has submitted and the Agency has reviewed all the ecotoxicity and UV/visible absorption data required by the Agency's data call-in resulting from the registration review of potassium salts of fatty acids. These data are cited on this Data Matrix.

Wolank 2/13/17

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		luct-Specific) (Ag			
Date: February 13, 2017  Applicant's/Registrant's Name & Address: W. Neudorff GmbH KG An der Muhle 3 31860 Emmerthal, Germany			EPA Reg. No./File Symbol: 67702-2	22	Page 1 of 3
		8 (B)	Product: Neudorff's Insecticidal Soap Concentrate		
Ingredients - Potassium salts of fa	atty acids			· · · · · · · · · · · · · · · · · · ·	<del></del>
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and composition	46385801	67702	OWN	
830.1600	Description of materials used to produce product	46385801	67702	OWN	
830.1620	Description of production process	46385801	67702	OWN	
830.1650	Description of formulation process				N.A.
830.1670	Discussion of formation of impurities	46385801	67702	OWN	
830.1700	Preliminary analysis	44980302	67702	OWN	
830.1750	Certified limits	44980302	67702	OWN	
830.1800	Enforcement analytical method	44980302	67702	OWN	
830.6302	Color	44980303	67702	OWN	
830.6303	Physical state	44980303	67702	OWN	
830.6304	Odor	44980303	67702	OWN	
830.6313	Stability				N.A.
830.6314	Oxidation/reduction; chemical incompatibility				N.A.
Signature	Walank		Name and Title: Walter G. Talarek Authorized Agent		Date 2/13/2017

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	DATA MATRIX (Pro	uuct-Specific) (Ag	circy Copy)	· · · · · · · · · · · · · · · · · · ·	<u> </u>
Date: February 13, 2017  Applicant's/Registrant's Name & Address: W. Neudorff GmbH KG  An der Muhle 3  31860 Emmerthal, Germany			EPA Reg. No./File Symbol: 677	702-22	Page 2 of 3
			Product: Neudorff's Insecticidal Soap Concentrate		
Ingredients – Potassium salts of fa	atty acids		<del></del>		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability				N.A.
830.6316	Explodability				N.A.
830.6317	Storage stability	44980303	67702	OWN	
830.6319	Miscibility				N.A.
830.6320	Corrosion characteristics	45398901	67702	OWN	
<del></del>		44980303	67702	OWN	
830.6321	Dielectric breakdown voltage				N.A.
830.7000	pН	44980303	67702	OWN	
830.7050	UV/visible light absorption				N.R.
830.7100	Viscosity	44980303	67702	OWN	
830.7200	Melting point			N.A.	N.A.
830.7220	Boiling point			N.A.	N.A.
830.7300	Density/relative density/bulk density	49424001	67702	OWN	
		44980303			
830.7370	Dissociation constants in water				N.A.
830.7520	Particle size, fiber length, and diameter distribution				N.A.
Signature	olank		Name and Title: Walter G. Tala Authorized Ag		Date 2/13/201

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DATA MATRIX (Product-Specific) (Agency Copy)					
Date: February 13, 2018  Applicant's/Registrant's Name & Address: W. Neudorff GmbH KG An der Muhle 3 31860 Emmerthal, Germany			EPA Reg. No./File Symbol: 67702-22		Page 3 of 3
			Product: Neudorff's Insecticidal Soap Concentrate		
Ingredients - Potassium salts of fa	atty acids		<del>,</del>		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7550/7560/7570	Partition coefficient (n-octanol/water)				N.A.
830.7840/7860	Water solubility				N.A.
830.7950	Vapor pressure				N.A.
870.1100	Acute oral toxicity	44980304	67702	OWN	
870.1200	Acute dermal toxicity	44980305	67702	OWN	
870.1300	Acute inhalation toxicity	44980306	67702	OWN	
870.2400	Primary eye irritation	44980307	67702	OWN	
870.2500	Primary dermal irritation	44980308	67702	OWN	
870.2600	Dermal sensitization	44980309	67702	OWN	
Signature Systam Signature			Name and Title: Walter G. Talarek Authorized Agent		Date 2/13/2017

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